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Pro Querente

IN THE FOURTH JUDICIAL DISTRICT COURT OF MONTANA
MISSOULA COUNTY

STEVE NELSON, MICHAEL
BOEHME, and BONNER
PROPERTY DEVELOPMENT, LLC,

Plaintiff,

vs.

PROJECT SPOKANE, LLC, and
SEAN WALSH,

Defendants.

Cause No. **DV-32-2020-604-OC**
 Dept. No. 1

PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT BE
ENTERED

1. Plaintiffs, Steve Nelson, Michael Boehme, and Bonner Property Development, LLC, request that the Court enter a temporary restraining order (TRO) enjoining the sale of millions of dollars of assets unilaterally scheduled by Defendants for Wednesday, June 3, 2020, at 10:00 a.m. Montana time, and to set a hearing on whether a preliminary injunction should be entered against sale of the assets pending entry of a final judgment in this case.

2. The motion is supported by separate fillings including (a) a principal brief; (b) the Declaration of Steven Nelson (with exhibits); (c) a notice of compliance with Mont. U. D. C. R. 3 regarding ex parte matters; and (d) a proposed order.

DATED this 1st day of June 2020.

Respectfully Submitted,
RHOADES SIEFERT & ERICKSON PLLC

By: /s/Quentin M. Rhoades
Quentin M. Rhoades
Robert Erickson
Pro Querente

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June 2020, I served a true and correct copy of the foregoing on the following persons by depositing said copy overnight delivery by FedEx, prepaid, and by email, addressed as follows:

Peter Ito
Ito Law Group
1550 Larimer Street, Suite 667
Denver, CO 80202
peter@itolawgroup.com

By: /s/ Quentin M. Rhoades
Quentin M. Rhoades

CERTIFICATE OF SERVICE

I, Quentin M. Rhoades, hereby certify that I have served true and accurate copies of the foregoing Motion - Motion to the following on 06-01-2020:

Project Spokane, LLC (Defendant)
365-B Clinton Street
Costa Meas 92626
Service Method: Email

Sean Walsh (Defendant)
365-B Clinton Street
Costa Mesa 92626
Service Method: Email

Electronically Signed By: Quentin M. Rhoades
Dated: 06-01-2020